

**Application Serial No. 10/781,497  
Amendment dated 7/28/2006  
in Response to Office Action dated April 28, 2006**

**REMARKS**

In the Office Action, the Examiner noted that claims 1-42 are pending in the application and that claims 1-9 and 13 have been allowed. The Examiner also noted that claims 10-12, 14, 16-36, 38 and 42 have been examined and non-finally rejected and that 15, 37 and 39-41 have been objected to. By this response, claims 10-12, 14-18, 20-38 and 40-42 have been amended. Thus, claims 1-42 are pending in the application.

**Rejections Under 35 U.S.C. § 112**

Claims 10-12 and 18-33 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regard as invention. Claims 10, 18 and 24 have been amended to overcome the indefiniteness rejection under 35 U.S.C. § 112, second paragraph.

The amendment of independent 18 and 24; and dependent claims 10-12, 19-23, 25-33 is believed to overcome such rejection and the traverse with respect to independent amended claims 18 and 24 is repeated herein with regard to claims 10-12 and 18-33 along with the accompanying arguments from above.

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**Rejections Under 35 U.S.C. § 102**

Claims 14, 16-17, 18-36 and 42 have been rejected under 35 U.S.C. § 102, as being anticipated by *Etzion et al.* (U.S. 6,985,835).

Applicants claim the invention as including a process whereby the invention facilitates a complete multi-staged feature based translation of a pre-existing source geometric model in a source CAD system to a desired translated target geometric model in a target CAD system. The process iteratively checks whether each feature can be successfully translated as desired and retains the feature in the translated target geometric model in the target CAD system.

Further, during the translation, if any discrepancy is identified, the claimed invention iteratively tries to resolve the discrepancy a predetermined number of times. If the discrepancy cannot be automatically resolved through iteration (claim 14), the invention then notifies the user of the discrepancy (see claim 15) and facilitates the user to help fix the discrepancy or problem before further continuing the staged translation to successfully generate a true and accurate desired target geometric model.

Nowhere is such feature taught or enabled by the prior art of record. *Etzion et al.* (U.S. 6,985,835) does not appear to allow/help the user to fix any/all discrepancy(s) encountered. There is no input from the user for a full and completely accurate iterative translation from the pre-existing source CAD model to the translated target CAD model.

As recited in independent claim 14, data is compared, discrepancies are identified, and discrepancies of a feature are automatically connected prior to generating another

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feature. The prior art does not teach or enable this feature. Independent claims 18 and 24 have similar limitations.

The whole process that *Etzion et al.* (U.S. 6,985,835) appears to teach is merely a method for edge correlation between design objects, without leaving any room for a 'human in the loop' or taking the user into confidence to do a full and accurate iterative translation.

The claimed invention, Applicants believe, is the only method of doing a full and accurate iterative translation of the pre-existing source model in the source CAD system into the desired translated target model in the target CAD system. The system fully involves a 'human in the loop' process, whereby each process of iterative translation is done by taking the user into confidence to do a true and accurate translation. Again, nowhere is such feature taught or suggested by the prior art of record.

The amendment of independent claims 14, 18, 24 and 36; and dependent claims 16-17, 19-23, 25-35 and 42 is believed to overcome such rejection and the traverse with respect to independent amended claims 14, 18, 24 and 36 is repeated herein with regard to claims 14, 16-17, 18-36 and 42 along with the accompanying arguments from above.

Claims 15, 37, 39 and 40-41 have been objected to as being dependent upon a rejected base claim. As the base claims have been amended herein and claims 15, 37, 39 and 40-41 include all the limitations of the amended base claims on which they rely, claims 15, 37, 39 and 40-41, are believed to have overcome such rejection.

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In order to prove a *prima facie* case of anticipation, the Examiner must provide 1) a single reference 2) that teaches or enables 3) each of the claimed elements (arranged as in the claim) 4) expressly or inherently 5) as interpreted by one of ordinary skill in the art. Here, the Examiner has not provided a single reference that teaches or enables each of the claimed elements as arranged in the claims, expressly or inherently.

Nowhere has the Examiner made a *prima facie* case of anticipation, with respect to the originally filed claims or the amended claims included herein. Hence, the Applicant respectfully traverses the Examiner's rejection. However, the claims have been amended to clarify their meaning and to expedite prosecution.

Withdrawal of the above-referenced rejections is respectfully requested.

### **CONCLUSION**

For all the reasons advanced above, the Applicant respectfully submits that the application is in condition for allowance, and action to that end is respectfully requested. If the Examiner's next anticipated action is to be anything other than a Notice of Allowance, the undersigned respectfully requests a telephonic interview before issuance of any such subsequent action.

Respectfully submitted,

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